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June 30, 2020

Via ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan
U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: *Williams v. KuCoin et al.*, Case No. 20-cv-02806 (GBD)
Letter Seeking Adjournment of Initial Pretrial Conference**

Dear Judge Daniels:

We represent Plaintiff in the above-referenced action. We write to request an adjournment of the initial pretrial conference, currently scheduled for Tuesday, July 7, 2020 at 9:30 a.m. (Dkt. No. 17.)

As the Court is aware, the action is a putative class action alleging claims under the federal securities laws against Defendants, and is governed by the provisions of the Private Securities Litigation Reform Act of 1995 ("PSLRA"). Pursuant to the PSLRA, any member of the putative class may move the Court for appointment as lead plaintiff. 15 U.S.C. §§ 77z-1(a)(3)(A), 78u-4(a)(3)(A). On June 8, 2020, Plaintiff timely moved for appointment as lead plaintiff. (Dkt. No 20.) Plaintiff's motion to serve as lead plaintiff is unopposed.

None of the Defendants has entered an appearance in this case, notwithstanding that Defendant KuCoin was served on May 5, 2020. (Dkt. No. 26.) Plaintiff's counsel engaged an investigator who located addresses for Defendants Michael Gan and Eric Don but was unable to locate an address for Defendant Johnny Lyu after a reasonable search. Service is underway as to Gan and Don, and Plaintiff anticipates moving for alternative service as to

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Defendant Lyu if counsel for KuCoin does not appear and waive service as to the individual Defendants.

The PSLRA also provides for an automatic stay of discovery pending the disposition of motions to dismiss in securities actions. 15 U.S.C. §§ 77z-1(b)(3)(B), 78u-4(b)(3)(B). Plaintiff anticipates that following appointment of a lead plaintiff, the lead plaintiff will file an amended complaint, and that Defendants will file a motion to dismiss the amended complaint in response. In light of the discovery stay mandated by the PSLRA, a continuance of the initial pretrial conference to a date following the resolution of any motion(s) to dismiss would advance the interests of judicial economy and preserve the resources of the parties and the Court. None of the parties has previously requested any adjournment or extension of time in this action.

Respectfully submitted,



Jordan A. Goldstein

Counsel for Plaintiff and Putative Class